



Ministry of Agriculture and Forestry, New Zealand

Te Manatu Ahuwhenua, Ngaherehere, Aotearoa



Ref: M-USA000

9 May2002

Sally Stratmoen
Chief, Equivalence Section
International Policy Staff
Office of Policy, Program Development and Evaluation
1400 Independence Avenue SW
Washington DC, 20250
UNITED STATES OF AMERICA

Dear Sally

DRAFT FINAL AUDIT REPORT - SEPTEMBER 6 - 8, 2001

Thank you for the opportunity to comment on the FSIS Draft Final Audit Report for the ratite inspection visit 6 -8 September 2001.

You ask about the New Zealand response to a letter sent to us on 18 October 2001. It would appear that the original letter was lost somewhere between New Zealand and your office. You should have received a resend of that letter now via our Embassy in Washington. If this is not the case please advise Jason Frost at the New Zealand Embassy, and we shall try again.

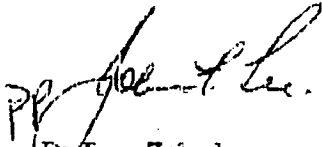
We understand that the reference to "marginally acceptable" in your covering letter equates to the "acceptable/re-review" outcome in the summary of the report. It should be noted that there was no exit meeting held thereby providing no opportunity to give clarifications to the reviewer. Therefore, New Zealand is providing specific comment to a number of points in the report in order to assist with the accuracy, and hence value of the Final Report.

The report noted that the establishment visited currently slaughters bovines, equines, and ratites (ostrich) at separate times, and notes that New Zealand will need to enter into discussions with Washington on this matter. New Zealand wishes to advise that separate representations will be made to Washington in this regard.

Since the receipt of this report, another on site review of the premises visited was conducted on 9 April 2002. The deficiencies noted in this report have been adequately addressed.

Appended as Annex I is the New Zealand response to the points raised by the Draft Final Report.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Dr. Tony Zohrab', with a large, stylized initial 'P' or 'Z' on the left.

Dr Tony Zohrab
Director (Animal Products)
MAF Food Assurance Authority

Annex I

New Zealand Response to the Draft Final Audit Report - 6-8 September 2001

Entrance Meeting

2. Ratite National Microbiological Database (NMD) of New Zealand (NZ)

At the time of the inspection New Zealand officials were in the process of developing this programme in association with representatives of the ratite industry. Work had been undertaken to determine the most appropriate carcass sampling sites. The establishment visited was carrying out microbiological sampling from those sites at the time of the visit, but these were not in accordance with a fully operational NMD. (Refer to later comments in this document).

Headquarters Audit

The third bullet on page 3 refers to generic *E. coli* and *Salmonella* testing which were not in place at the time, although a premises-based programme was in place at the time. (Refer to later comments in this document).

Government Oversight

Please note that the reference to "Commerce" on line 7 is incorrect. MAF Food Assurance Authority and MAF Verification Agency are both part of the Ministry of Agriculture and Forestry. Asure New Zealand is a State-Owned Enterprise (SOE) and is accountable to MAF Food for the performance of ante-mortem and post-mortem inspection to MAF Food standards.

SANITATION CONTROLS

Facilities and equipment, which had not been properly maintained at the time of the visit, were scheduled for attention and were corrected in a timely and appropriate fashion. This was demonstrated during the current FSIS inspection visit to New Zealand (3 April - 2 May 2002).

Cross-Contamination

New Zealand interprets the comment with regard to faecal contamination as noting positive corrective action.

The potential contamination from worker armpits was addressed following the FSIS inspection.

Humane Slaughter

New Zealand places high priority on stunning being performed in an humane manner, therefore, MAF Food is extremely disappointed to find that stunning was unacceptable to the reviewer during his inspection. The humane slaughter approval issued by MAF Food for the

establishment explicitly requires stunning to cease immediately if it cannot be performed humanely. Immediate action was taken to address the defective device.

Maintenance

Maintenance was scheduled and completed within agreed time frames.

Personnel Hygiene and Practices

The establishment to ensure that there were no continuing potential contamination problems addressed the matter of sleeveless shirts.

SLAUGHTER/PROCESSING CONTROLS

The dressing deficiency noted, "many feathers on carcasses", was addressed by the establishment immediately.

HACCP Implementation

At the time of the FSIS inspection the HACCP plan was in the process of being assessed by a MAF Verification Agency HACCP Co-ordinator as part of the recognition of validity process required by MAF Food for US-certified establishments.

Testing for Generic *E. coli*

While the establishment was performing microbiological sampling of carcasses using MAF Food agreed sampling sites there was no formal National Microbiological Database (NMD) in place, and hence formal carcass sampling numbers had not been established. An NMD has only recently been agreed between the ratite industry and MAF Food and is now being implemented. This puts many of the points identified in *Attachment C* of this report, in to place under an official programme.

The results obtained during the first year this NMD programme is in place will serve as a baseline study. New Zealand is prepared to share this information with FSIS to assist in the determination of appropriate performance criteria for ratite slaughter and dressing.

ENFORCEMENT CONTROLS

Inspection System Controls

As indicated in the covering letter, New Zealand will undertake separate discussions with FSIS with regard to the fact that this establishment is currently slaughtering and dressing equines.

Testing for *Salmonella* Species

New Zealand is currently implementing testing for *Salmonella* species as part of the ratite NMD programme.